

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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JAMES GOODREAU AND )  
ANN GOODREAU ) C.A. No. 05-11611 WGY  
)  
-VS.- )  
)  
ICS, BLOUNT INC. )  
)  
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)

STATEMENT OF THE DEFENDANT  
PURSUANT TO LOCAL RULE 16.1,  
SECTIONS (B), (C), and (D)

INTRODUCTION

Defendant's counsel has been unsuccessful in attempting to communicate with plaintiff's counsel concerning the subject matter of this statement and the scheduling conference. Accordingly, this is the defendant's statement pursuant to the applicable local rule.

**I. AGENDA OF MATTERS FOR DISCUSSION AT SCHEDULING CONFERENCE:**

1. The proposed Pre-Trial schedule; and
2. Time for accomplishment of the specified Pre-Trial Steps.

**II. PROPOSED PRE-TRIAL SCHEDULE:**

The defendant proposes that discovery occur as follows:

Initial Disclosures Will Be Exchanged:  
January 8, 2006

Deadline For Parties to Exchange Written Discovery:  
No later than March 6, 2006

Deadline For Motion To Change Venue, Joinder Of  
Parties And Amendment Of Pleadings:  
May 6, 2006

Non-Expert Depositions To Be Completed On Or Before:  
July 31, 2006

Plaintiff Shall Designate Experts And Provide  
Rule 26(a)(2) Information On Or Before:  
September 6, 2006

Defendant Shall Designate Experts and Provide  
Rule 26(a)(2) Information On Or Before:  
November 6, 2006

Expert Depositions To Be Completed On Or Before:  
December 6, 2006

Deadline To Complete Discovery:  
December 6, 2006

### III. SCHEDULE FOR MOTION AND PRE-TRIAL CONFERENCE

All Motions For Summary Judgment F.R.C.P. 56 To Be  
Filed On Or Before:  
January 6, 2007

Joint Pre-trial Conference Statement To Be Filed On  
Or Before:  
February 6, 2007

Trial:  
March 6, 2007

**IV. SETTLEMENT PROPOSALS:**

No information concerning plaintiff's accident, basis for alleged liability, or damages have been received by defendant's counsel. No settlement proposal has been made.

**V. ADR OPTIONS:**

Directly after the conclusion of discovery, after first attempting to settle the case through their efforts.

**VI. CONSENT TO TRIAL BY MAGISTRATE:**

At this time, the defendant does not consent to a trial of this matter by a Magistrate Judge.

**VII. CERTIFICATIONS:**

Filed herewith.

**VIII. PRESENT DISCOVERY DISPUTE:**

Written discovery was served upon plaintiff September 6, 2005. Defendant awaits responses.

Defendant, Blount, Inc.

By Its Attorneys,

/s/ Gerald C. DeMaria

Gerald C. DeMaria (BBO No. 549381)

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CERTIFICATION

I hereby certify that a copy of the within document has been mailed, postage prepaid, to the following counsel of record this 6th day of October, 2005.

Brian C. Dever, Esq.  
KECHES & MALLEN, P.C.  
122 Dean Street  
Taunton, MA 02780

/s/ Gerald C. DeMaria